

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
DIVISION

Janie L. Kinsey
and, Husband
C. H. Kinsey

Plaintiff(s),

v.

C. Lance Gould and
Citifinancial Associates, a Transouth
Transouth Defendant(s). enort

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DEBRA P. HAMILTON, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA

CIVIL ACTION NO.

2:05CV636-X
F

DEMAND FOR JURY TRIAL

COMPLAINT

1. Plaintiff(s)' address and telephone number: 420 County Rd 250
Headland, Alabama 36345
334-985-3413

2. Name and address of defendant(s): Citifinancial 2407 Montgomery Hwy
Dothan, Alabama 36303.
C. Lance Gould P.O. Box 4160
Montgomery, Alabama 36103-4160

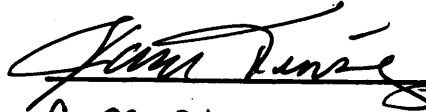
3. Place of alleged violation of civil rights: Montgomery, Alabama at Beasley Law
firm, Dothan, Alabama - Citifinancial

4. Date of alleged violation of civil rights: March 25, 2005 December 3, 2004
June 4, 2005

5. State the facts on which you base your allegation that your constitutional rights have been violated: I Janie Kinsey and Husband C. H. Kinsey refused
opposed the Settlement Citifinancial offered, prefer to go
to Court. Mr. Lance Gould refuse to let us have a jury trial
Citifinancial Associates, Transouth damages as a result
of alleged wrongdoing to the loans we had with them.

6. -Relief requested: _____

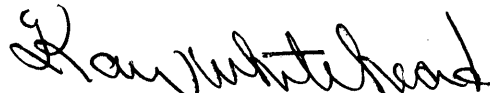
Date: 7-4-05



C. R. Kinsey
Plaintiff(s) Signature

Witnessed My Hand + Seal

7-4-05


NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: Apr 1, 2008
BONDED THRU NOTARY PUBLIC UNDERWRITERS

Ark. 329

Page 1

(1) Negligence = \$100,000.00 Double damage RECEIVED

(2) Fraud = \$100,000.00 Double damages

(3) Trespass 300,000.00 Double damage

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DEBRA B. HACKETT, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT OF ALA

Exemplary damages - see Springer v. Fuel Co., 146 Pa. St. 154, 46 A. 370

(1) property loss \$100,000.00 = time off work, fueling fee etc -

(2) oppression = \$1,000,000.00 see Baker v. Peck 1 Cal. App 2nd 231, 36 P.2d 406
404

(3) malice = \$200,000.00 see Dunn v. Hall 1 Ind. 344

(4) fraud = \$150,000.00 = see Goldstein v. Equitable Life Assur. Soc of
U.S., 160 Misc. 364, 249 N.Y.S. 1064, 1067.

(5) fraud = \$150,000.00 see Johnson v. McDonald, 170 OKL. 117, 39 P.
2d 150.

(6) fraud actual = \$100,000.00

(7) ~~fraud constructive error~~ SKinner

(8) Wanton act \$200,000.00 = see Ziman v. Whitley, 140 Conn. 108, 147 A.
370 372.

(9) Wanton Injury = \$275,000.00 see Duke v. Games 224 Ala 519
140 So. 600, 601.

(10) Wanton Negl. genck = \$175,000.00 ^{see} Craig v. Stagner, 159
Tenn. 511, 195 W.2d 234, 236

Relief requested = Double damage see Daniel V. Vaccaro 41 Ark. 329
Mental anguish = \$400,000.00 see Railway Co. v. Miller, 25 Tex.
Civ. App. 460, 61 S.W. 978.

(12) Confidentiality = \$600,000.00
Citifinancial has lost our identity social Security number
date of birth, all of our life we worried about who may use
social security number in future or maybe after expiration
of life.

(13) Discrimination = \$100,000.00

We ^{are} willing to accept what the Court awards us should
we appreciate in advance have a blessing

Respectful yours
JMM jms
C. H. Rainey

United State District Court Clerk
One Church Street.
Montgomery, Alabama 36104

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2005 JUN 13 P 1:33
DEBRA P. HARRIS
U.S. DISTRICT COURT
MONTGOMERY, ALABAMA

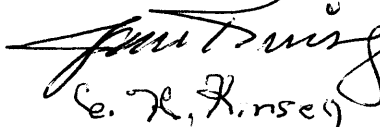
Dear Madam.

I June Kinsey would like
to file a Complaint in this office. Citip
financial. And my Attorney C. Lance Gould.
Details:

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DEBRA P. HARRIS
U.S. DISTRICT COURT
MONTGOMERY, ALABAMA

Mr. Gould was hired by me (June Kinsey &
Husband C.N. Kinsey) to investigate whether
a lawsuit can be brought against Citip. Finance.
August 5, 2004 he sent papers to us to
sign to make a settlement with Citip. Finance.
My husband and I oppose the settlement
see Attachments #1 August is when I realize
this is a ^{LAW} suit, when they agree to make a
settlement. He advised us very knowledgeable
about the lawsuit. Mr. Gould stated we have option
take the settlement or proceed this case in
court. We explain to him we prefer a case in
this situation to the Judge and Jury. So he
dismiss himself from our case see Attachment #2

Money Order enclose 250⁰⁰. Your assistance
are highly appreciated by us. Thank you,
Thank you have a bless DAY.

Respectful Yours
C.H. & Janie Kinsey

C. H. Kinsey